

In The United States District Court
For The Southern District of Texas
Houston Division

Sandra Jean Allen
(Plaintiff)

"Pro Se"

Vs.

Infinity County Mutual Insurance Company
(Defendant)

Plaintiff's Original Petition

I.

To The Honorable Judge of Said Court:

Now Comes Sandra Jean Allen,
Called Pro Se Plaintiff Complaining of
about Infinity County Mutual Insurance
Company. They are the Defendant, and
I would like to Show the Court the
following:

II.

Jurisdiction And Venue

This court has Jurisdiction and Venue is proper in Harris County, Texas because Defendant Infinity County Mutual Insurance Company is a Texas Corporation Agency Business that is located at 8588 Katy Freeway Suite 105 Houston, Texas 77024 and their phone number is: 1-800-334-1661 or 215-431-9560. They are registered in this County.

Parties And Services

III

1. Pro Se Plaintiff, Sandra Jean Allen Brings this action individually, and I live in Harris County.

2. Defendant, Infinity County Mutual Insurance Company is a Nation Wide Agency and has license to Sale Insurance to customers in The State of Texas. Please Serve them with this citation at their address 8588 Katy Freeway Suite 105 Houston, Texas 77024.

FACTS

IV

Infinity County Mutual Insurance Company

Sales insurance out of the building and
Appraise the cars when they have been
Vandalize, stolen, or wrecked. At this
Katy Freeway location, 8588 Katy Freeway
Suite 105 Houston, Texas 77024

V

I am a citizen of The United States
of America, I am in this country legally.
I have a right to be treated fairly and
Justly when exercising my "Pro Se Rights".

On May 4, 2016 my 2006 Ford
Focus ZX4 car was Vandalized at
my apartment complex. I reside
at Arcadia At Westheimer Apartment Complex.
I have lived here since July 3, 2011.
Which is located at 2550 Joel Wheaton
Rd #4510 Houston, Texas 77082

VI

I called Houston Police Department to
report the Vandalization to my vehicle.
Whoever did this caused some expensive
damage to my car. They stole parts off
of my car such as the front grill, my left
window handle inside the car to roll down
my left window, they damage my A/C unit,
they tore my back bumper apart, they
broke both door handles to my car, which

Caused me to go inside the truck and let the back seat down to gain entrance to the doors to open. They damage my AM/FM Radio CD Player in my car.

Houston Police Department arrived and gave me my case Incident Number. (See Exhibit A). My Car was Vandalize twice at my residence. I have two Police case number on different dates.

I called my insurance company and reported the Vandalization and they gave me two Claim Numbers.

I took my car into Infinity Insurance Appraise Center, but they did not accommodate me with no true Customer Service. A man Name Ray Barnhart came outside and looked at my car and Said, "You Need to Call the Police" and tell them "that you been in a car wreck"? I told Ray Barnhart I have never had an accident in my life?

He told me I can not fix your car unless you do what I tell you to do? I told Mr. Ray Barnhart, but, that is not true? I will not make no false police report? These damages are Vandalization at my Apartment Complex. I came outside to go pick my Son up from School, and all this damage was done in the parking lot of my apartment

Complex. He took video pictures of my car Mr. Ray Barnhart. Then, he said you can leave and someone will contact you. I got a letter in the mail "stating we are not going to fix your car". I called Infinity Insurance Company, and I told them "I have been a loyal customer for 5 years with yall" I have never had an accident, I pay full coverage insurance on time, and yall are not going to fix my car someone vandalize.

They told me over the phone that you must pay \$250.00 dollars for each thing that is broke on your car. I told them my policy states pay a one time \$250.00 dollar deductible not \$250.00 dollars for each thing on the car that is broken.

They even sent a letter stating pay 3 \$250.00 dollar deductible because we see 3 claims done on your vehicle. (See Exhibit B) They told me that only \$43.33 worth of damage was done to your car. When they sent me an estimate of the damages of \$1,591.38. (See Exhibit C)

I filed a complaint with Texas Department of Insurance back in June of 2016. They investigated Infinity County Mutual Insurance Company (See

Exhibit D). Ms. Linda Trevino Sent me a letter saying "Their Investigation is finished" they find no violation on Infinity County Mutual Insurance Company. (See Exhibit E). Ms. Linda Trevino is an Insurance Specialist for Texas Department of Insurance.

I had to go get a Title Max loan on my car, so I could get atleast one door to open on the driver side fixed. To gain entry to my vehicle. Infinity Insurance stated "that \$43.33 was the locks damage to the doors on my car". I took out a \$640.00 dollar loan at TitleMax to get my car fixed. (See Exhibit F).

Infinity Insurance County Mutual lied to me and Texas Department of Insurance about the damages done to my car doors were below my \$250.00 Deductible and only \$43.33 is what it would cost to fixed both doors. One door, I fixed at Russell and Smith Ford Dealership cost \$315.49 (See Exhibit G)

VII

At all times, Infinity County Mutual Insurance Company and It's employee's are guilty of negligent infliction, defamation, calumny, libel, slander, actual malice, intentional torts,

and dignitary torts towards Plaintiff Sandra Jean Allen:

1. Fact, my car was vandalized at 2550 Joel Wheaton Rd at Arcadia at Westheimer Apartments.
2. Fact, I had full coverage insurance with Infinity County Mutual Insurance Company.
3. Fact, I filed a claim with Texas Department of Insurance on Infinity County Mutual Insurance Company.
4. Fact, I took out a title Max Loan to get one car door fixed at Russell and Smith Ford Dealership.
5. Fact, I tried to hire me an attorney Eric Nielsen. He said he would represent me, but called me on the phone and said he changed his mind. After, I had a consultation with him at The Nielsen Law Firm at 9806 Northwest Fwy, Suite 314 Houston, Texas 77092 along with a contract he had given me. (See Exhibit H).
6. Fact, Infinity County Mutual Insurance Company wanted me to pay \$250.00 3X the amount of a 1X deductible.

7. Fact, Ray Barnhart told me to call the police and tell them that I have been in a car wreck in order for car to be fixed.
8. Fact, I have been a Customer that was very loyal to Infinity County Mutual Insurance Company for 5 years.
9. Fact, My 2 doors handles were broken, my front grill was taken off the car, my back bumper was torn apart, my left window handle was stolen, my CD/A.M.F.m Radio was damage and my A/C was damaged.
10. Fact, I tried to hire me an attorney to Sue Infinity County Mutual Insurance Company. But, Eric Nielsen called me and stated "He changed his mind".

Damages For Plaintiff, Sandra Jean Allen

VIII

The Plaintiff, Sandra Jean Allen is asking the court for \$25,000 dollars on each vandalize item on my car that Infinity County Mutual Insurance Company refused to honor my insurance policy which I paid for 5 years straight. I never had an accident in life. The first time I make a claim on my car with my insurance company. They completely denie my claim.

The Plaintiff, Sandra Jean Allen is asking for \$25,000.00 dollars on each Vandalize Car damage. I am Seeking \$25,000 for Front Grill stolen, \$25,000 for Right Door handle, \$25,000 for Left Door handle, \$25,000 for left window handle, \$25,000 A/C damaged, \$25,000 for Back Bumper, \$25,000 for AM/FM CD Radio Player damaged and \$25,000 for being asked by Ray Barnhart to make a false frivolous police report at his office. In order, to get my car fixed by Infinity County Mutual Insurance Company.

1. Injunctive Relief
2. Actual Damages
3. Court Cost
4. Plaintiff, Sandra Jean Allen has suffered losses and damages in a sum within the jurisdictional limits of the court and for which this lawsuit is brought,

Prayer

Prose Plaintiff, Sandra Jean Allen respectfully Prays, that Infinity County Mutual Insurance Company be cited to appear and answer this petition.

1. Damages is within Jurisdiction of the Court.
2. Post Interest at Legal Rate.
3. Pre Interest from the date the case is filed.

Respectfully Submitted,



Sandra Jean Allen

Sandra Jean Allen
PO Box 840923
Houston, Texas 77284
832-398-9190

The Plaintiff Is "Pro Se"